

November 23, 2022

VIA ECF

The Honorable Paul G. Gardephe, U.S.D.J.
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 705
New York, NY 10007

Re: Joint Letter in Tang v. Tang, No. 22 Civ. 5736 (PGG) (S.D.N.Y.)

Dear Judge Gardephe:

Plaintiff Vincent Tang and Defendant Wilson Tang respectfully submit this joint letter to request the adjournment of the December 1, 2022 initial pretrial conference calendared in this action, so that the Parties may schedule and conduct an out-of-court mediation.

The Parties previously agreed to conduct a mediation to explore a settlement of this dispute, but that mediation was not scheduled or held. *See* ECF No. 20. New counsel for Plaintiff has appeared in this action and stands ready to schedule and conduct the contemplated mediation, including the production of certain bank records. The Parties continue to believe a mediation of this action would be productive.

Accordingly, the Parties respectfully request the Court adjourn the December 1, 2022 pretrial conference and refrain from scheduling a pre-motion conference regarding Defendant's anticipated motion to dismiss, *see* ECF Nos. 21, 24, so that the Parties may attempt to resolve this case without the necessity of further litigation. The Parties will update the Court once a mediation date has been selected.

Respectfully submitted,

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe, U.S.D.J.

Dated: Nov. 29, 2022

The conference is adjourned
to January 19, 2023 at
11:00 A.M.

Hon. Paul G. Gardephe
Page 2

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cc: All Counsel of Record (via ECF)

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Wednesday, November 02, 2022

VIA ECF

Hon. Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

RE: Pre-Trial Motion Conference
Choto Pleitez v. Republic of El Salvador, No. 1:21-cv-1424-PGG

Dear Judge Gardephe:

On September 14, 2022, counsel for the Defendants Republic of El Salvador, the Armed Forces of El Salvador, and the National Civil Police of El Salvador (collectively, “Government Defendants”) submitted a letter motion requesting a pre-trial motion conference regarding a motion to dismiss or alternatively set a schedule for the filing and briefing of their motion.

In a letter to the Court dated November 2, 2022, the Government Defendants requested the Court authorize the filing of their Motion to Dismiss without a pre-trial conference based on the fact that Plaintiff’s counsel did not respond to the September 14, 2022 letter requesting a pre-trial conference. Pursuant to Section IV.A of your Honor’s Individual Rules of Practice, a pre-trial motion conference is required for Fed. R. Civ. P. 12 motions. Because the pre-trial motion conference is required and a response was not required, the undersigned counsel was anticipating that a notice of the conference date and time would be forthcoming.

A pre-trial conference is scheduled for December 1, 2022.

Respectfully submitted,

Charlie Carrillo

Charlie Ezra Carrillo

cc: counsels for Defendants (by ECF)

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